

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

CHILD TRENDS, INCORPORATED et al.,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
EDUCATION et al.,

*Defendants.*

Case No. 8:25-cv-01154-BAH

**[PROPOSED] ORDER**

It is hereby **ORDERED** that Plaintiffs' Motion for a Preliminary Injunction or, in the Alternative, Writ of Mandamus is **GRANTED**. It is further

**ORDERED** that Defendants U.S. Department of Education; Linda McMahon, in her official capacity as Secretary of Education; Matthew Soldner in his official capacity as Acting Director of the Institute of Education Sciences at the Department of Education; and Mark Washington, in his official capacity as Deputy Assistant Secretary for Management and Administration at the Department of Education, are preliminarily enjoined from carrying out or effectuating their decisions to operate zero Regional Educational Laboratories (RELs) and just two Comprehensive Centers, and are preliminarily enjoined to immediately operate the statutorily required number of RELs and Comprehensive Centers under 20 U.S.C. §§ 9564 and 9602, and are preliminarily enjoined to take all steps necessary to enable the RELs and Comprehensive Centers to carry out these programs as set forth in 20 U.S.C. §§ 9564 and 9602; and it is further

**ORDERED** that Defendants McMahon, Soldner, Washington, and Amy Gleason, in her official capacity as Acting Administrator of the U.S. DOGE Service, and those acting in concert and participation with them, are preliminary enjoined from giving effect to the termination notices sent to Plaintiffs regarding their prime Comprehensive Center grants, and are preliminarily enjoined to re-commence performance under the prime Comprehensive Center grants to Plaintiffs; and it is further

**ORDERED** that Defendants McMahon, Soldner, Washington, and Gleason, and those acting in concert or participation with them, are preliminarily enjoined from terminating Plaintiffs' contracts, grants, cooperative agreements, and any such instrument where Plaintiffs are subcontractors or subrecipients, at any agency of the federal government, where DOGE and Gleason would carry out, or be directly responsible for, the terminations; and it is further

**ORDERED** that Defendants McMahon, Soldner, Washington, and Gleason, and anyone acting in concert or participation with them, are preliminarily enjoined from terminating any grants to Plaintiffs where those terminations are based on program goals and agency priorities and where the grant either (a) has a period of performance beginning on October 1, 2024 or later and the terms and conditions of the grant do not clearly and unambiguously provide that the grant may be terminated based on program goals and agency priorities; or (b) has a period of performance beginning prior to October 1, 2024 but the awarding agency did not adopt the 2020 version of the Uniform Grants Guidance; and it is further

**ORDERED** that, if the preliminary injunctive relief set forth above is not available, the Court **ISSUES** as writ of mandamus: (a) compelling Defendants McMahon and Washington to not give effect to the termination notices sent to Plaintiffs regarding their prime Comprehensive Center grants, and to re-commence performance under the prime Comprehensive Center grants

to Plaintiffs because Defendants had a duty to not terminate these grants except as permitted under applicable regulations; and (b) compelling Defendants McMahon, Soldner, and Washington to maintain and operate the statutorily required number of RELs and Comprehensive Centers under 20 U.S.C. §§ 9564 and 9602, and to take all steps necessary to enable the RELs and Comprehensive Centers to carry out these programs as set forth in 20 U.S.C. §§ 9564 and 9602; and it is further

**ORDERED** that no security bond is required because Defendants will not suffer any costs from the preliminary injunction. Fed. R. Civ. P. 65(c).

Dated: \_\_\_\_\_

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The Honorable Brendan A. Hurson  
United States District Judge